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8 **UNITED STATES DISTRICT COURT**
9 **WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

10 SHILLING, et al.,

11 *Plaintiffs,*

12 v.

13 DONALD J. TRUMP, in his official capacity as
14 President of the United States, et al.,

15 *Defendants.*

Case No. 2:25-cv-241

**DECLARATION OF JANE DOE IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

16
17 I, Jane Doe,¹ declare as follows:

18 1. I am a 37-year-old woman, and I live in Olympia, WA.

19 2. I am a Sergeant First Class in the U.S. Army and am currently stationed at Joint
20 Base Lewis McChord, WA.

21 3. I enlisted in the U.S. Army in 2007. I have been serving for more than 17 years.

22 4. I chose the military as a career path for the opportunities. The military was a path
23 toward a better life and out of an economically depressed State. I stayed in and advanced up the
24 ranks because of the people standing next to me, the Soldiers I serve with are a constant
25 inspiration and I am forever honored to serve with them. The Army has always been a diverse
26 melting pot of cultures and personalities, a distillation of the American people. I have met some

27 ¹ Jane Doe is a pseudonym. I am submitting this declaration under a pseudonym to protect my
28 privacy and to protect my family and me from harassment and violence.

1 of my closest friends and continue to keep in touch long after moving duty stations. I am proud
 2 to serve my nation and wear the uniform. I am especially proud to be an example as a senior
 3 Non-Commissioned Officer, it is a privilege to mentor junior Soldiers and to watch them reach
 4 their highest potential.

5 5. I began my military career as an Automated Test Systems Operator/Maintainer at
 6 Fort Cavazos, TX where I deployed twice to Iraq; in 2009 and 2011. My primary role during
 7 both deployments was Convoy Security engaging in frequent missions outside the safety of our
 8 Forward Operating Bases and into Iraq.

9 6. My current military occupation specialty is Satellite Communications Operator-
 10 Maintainer with an Additional Skill Identifier 1C, Satellite Controller. I'm currently serving in
 11 the role of Platoon Sergeant. Before my current role, I served as an Information Technology
 12 Supervisor in Camp Arifjan, Kuwait. My positions have required a Top Secret clearance, which I
 13 have maintained since 2014.

14 7. I am transgender. I have always known that something felt different, but growing
 15 up in a small farming town, I was not exposed to anything queer beyond slurs and hate. In 2020 I
 16 finally started to find the words to express my identity, but with the last ban I kept it inside. It
 17 slowly ate at my mental health until I came out to my wife in September 2021. Shortly after, I
 18 received my gender dysphoria diagnosis and started living authentically. The difference has been
 19 immensely positive, I am a vastly more present and productive person, spouse, parent, and
 20 Soldier.

21 8. In consultation with health care professionals, I have taken clinically appropriate
 22 steps to transition. I also have ongoing transition-related health care needs. All medical plans
 23 have been signed off by my Brigade Commander, who can, if mission requires, deny one's
 24 medical transition steps until circumstances are conducive and time is available.

25 9. I have taken legal steps to transition. in April 2023 I applied for my passport with
 26 a Female gender marker. I have changed my gender marker with the Social Security
 27 Administration and have a Washington license reflecting female.

28 10. I submitted for my gender marker change in the Defense Enrollment Eligibility

1 Reporting System, which was accepted by the military in February 2024, and since then I have
 2 been living and working fully according to female standards in dress, grooming, and physical
 3 fitness.

4 11. At the time I came out in the military as transgender in 2021, my command team
 5 was immediately supportive of my transition and I have never once had an issue with superiors,
 6 peers, or subordinates. Since coming out, I have been selected for positions of increased
 7 responsibility and trust, completed a nine-month assignment to Kuwait, and have been promoted
 8 into senior leadership. I am currently preparing for two international missions this year, where I
 9 will assume key leadership positions.

10 12. I have received awards and decorations for my service including three Army
 11 Commendation medals, eight Army Achievement Medals, Army Good Conduct Medal five
 12 times, a National Defense Service Medal, Iraqi Campaign Medals with two campaign stars, a
 13 Global War on Terrorism Expeditionary Medal, Global War on Terrorism Service Medal, Armed
 14 Forces Service Medal, Humanitarian Service Medal, three Army NCO Professional
 15 Development Ribbons, The Army Service Ribbon, The Army Overseas Service Ribbon, The
 16 Army Senior Space Badge, The Combat Action Badge, A Marksmanship Qualification Badge-
 17 Expert with Carbine.

18 13. Being able to serve openly as a transgender individual has made me a stronger
 19 asset to the military. I function as a productive, healthy member of the military, and I am able to
 20 forge stronger relationships with others in my unit. I feel I am more able to execute mission
 21 requirements than I would be able to, without medical interventions and living as my most
 22 authentic self. Honesty is the single biggest piece in building a cohesive team and if you are
 23 unable to be honest with yourself, how can you do so with anyone else? I have noticed an
 24 increase in honest and productive conversations between myself and others in my current and
 25 previous units, bringing cohesion and morale up, and fostering stronger ties.

26 14. I have engaged in speech and conduct disclosing my transgender status, including
 27 by coming out to my chain of command and my fellow service members as needed. I have also
 28 expressed my gender identity by taking steps to transition and living openly as a woman in

1 military life. I want to continue to be able to engage in speech and conduct disclosing my
2 transgender status, as needed, and expressing my gender identity.

3 15. Since Executive Order No. 14183 (the Executive Order) was signed, I have felt
4 terrified for my, and my family's future and safety. The prejudicial language of the Executive
5 Order paints me and my transgender siblings in arms as dishonest, dishonorable, bad for unit
6 morale and cohesion, and a host of other things not conducive to service.

7 16. I am the primary provider for my household. My family and I were recently
8 relocated by the military to a high cost-of-living area, my salary is about 2/3 of my household
9 income. My family's medical benefits are provided by tri-care and tied to my service. If I were to
10 get separated, it would be disastrous to our financial stability. I plan to pass my GI Bill benefits
11 to my child, to set them up for the greatest chance at success by drastically reducing his
12 education costs. I would lose that ability if I were to be separated. My necessary medical care
13 would be interrupted. I am also on the high-3 retirement plan, if I am separated before 20 years
14 of service I could very well likely lose all pension related and post retirement medical benefits
15 that would be afforded to me.

16 17. The Executive Order puts my career directly at risk. In addition to the directions
17 to change medical standards for military service, the specifically hostile wording may already be
18 eroding unit cohesion and increasing the likelihood of violence against the transgender military
19 community.

20 18. Further, the hostile language leads me to fear that they may attempt to separate
21 under dishonorable/other-than-honorable conditions, which would further endanger my future by
22 stripping me of all benefits afforded to a veteran and greatly compromising future employment
23 prospects. Comparison of gender dysphoria to other service exclusive conditions leads me to
24 believe that my security clearance may be in jeopardy, loss of which would compromise further
25 mission readiness and future employment prospects.

1 I declare under the penalty of perjury that the foregoing is true and correct.

2
3 DATED: February 15, 2025

Jane Doe

Jane Doe (Feb 16, 2025 16:21 PST)

Jane Doe